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UNITED STATES DISTRICT COURT**DISTRICT OF NEVADA**

INTERIOR ELECTRIC INCORPORATED
NEVADA, a domestic corporation,

Plaintiff,

vs.

T.W.C. CONSTRUCTION, INC., a Nevada
corporation; TRAVELERS CASUALTY AND
SURETY COMPANY OF AMERICA, a
Connecticut corporation; MATTHEW RYBA, an
individual; GUSTAVO BAQUERIZO, an
individual; CLIFFORD ANDERSON, an
individual; POWER UP ELECTRIC
COMPANY, a Nevada corporation, dba POWER
ON ELECTRIC COMPANY; BAMM
ELECTRIC LLC, a Nevada limited liability
company; PROLOGIS, L.P., a Delaware limited
partnership; AML PROPERTIES, INC., a
Nevada corporation; AML DEVELOPMENT 3,

Case Number: 2-18-cv-01118-JAD-VCF

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
MOTIONS TO DISMISS AND JOINDERS**

(FIRST REQUEST)

1 LLC; a Nevada limited liability corporation;
2 LAPOUR PARTNERS, INC., a Nevada
3 corporation; DON FISHER, an individual;
4 PHILCOR T.V. & ELECTRONIC LEASING,
5 INC., a Nevada corporation, dba NEDCO; QED,
6 INC., a Nevada corporation; TURTLE &
7 HUGHES, Inc., a New Jersey corporation; DOES
8 I-X, inclusive; and ROE CORPORATIONS I-X,
9 inclusive,

Defendants.

Plaintiff Interior Electric Incorporated Nevada ("Interior Electric"), through the law firm of Marquis Aurbach Coffing and the Law Offices of Philip A. Kantor, P.C., Defendants TWC Construction, Inc., Travelers Casualty and Surety Company of America, Matthew Ryba, AML Properties, Inc., AML Development 3, LLC, LaPour Partners, Inc., and Don Fisher, through the law firm of Green Infuso, LLP, Defendant Turtle & Hughes, Inc., through the law firm of Procopio, Cory, Hargreaves & Savitch, LLP, and Defendant Prologis, L.P., through the law firm of McDonald Carano LLP, hereby stipulate and agree as follows:

1. On August 30, 2018, Defendant Turtle & Hughes, Inc., filed a motion to dismiss [ECF No. 50];

2. On August 31, 2018, Defendants TWC Construction, Inc., Travelers Casualty and Surety Company of America, Matthew Ryba, AML Properties, Inc., AML Development 3, LLC, LaPour Partners, Inc., and Don Fisher, filed a motion to dismiss [ECF No. 55];

3. On August 31, 2018, Defendant Prologis, L.P., filed a joinder [ECF No. 56] to the motion to dismiss [ECF No. 55], separately setting forth dismissal arguments;

4. On September 7, 2018, Defendant Turtle & Hughes, Inc., filed a joinder [ECF No. 63] to the motion to dismiss [ECF No. 55];

5. This is the first stipulation for an extension of time to respond to the motions to dismiss [ECF Nos. 50 and 55] and the joinders thereto [ECF Nos. 56 and 63];

6. The requested extension is needed for the following reasons: (a) during the opposition period, Interior Electric's counsel had separate pre-planned vacations, the costs for

1 which had already been paid; (b) during the opposition period, Interior Electric's counsel had to
2 file an answering brief in the Ninth Circuit, file an opening brief in the Nevada Supreme Court, a
3 motion for a new trial in a state court case, complete briefing on sixth summary judgment motions,
4 attend a previously scheduled mediation (as counsel for the special deputy receiver for Nevada's
5 commissioner of insurance, in the largest insurance receivership in the history of Nevada),
6 participate in several previously scheduled depositions, and attend to other case related matters.

7 7. Accordingly, the parties stipulate and agree to extend the time for Interior Electric
8 to respond to the motions to dismiss [ECF Nos. 50 and 55] and the joinders thereto [ECF Nos. 56
9 and 63], to September 28, 2018.

10 8. This stipulation is not entered into for any improper purpose or to delay.

11 IT IS SO STIPULATED.

12 Dated this 13th day of September, 2018.

Dated this 13th day of September, 2018.

13 MARQUIS AURBACH COFFING

GREEN INFUSO, LLP

14 By: /s/ Chad F. Clement

By: /s/ Keith Barlow

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ORDER

IT IS SO ORDERED.

Interior Electric's new deadline to respond to the motions to dismiss [ECF Nos. 50 and 55] and the joinders thereto [ECF Nos. 56 and 63], shall be September 28, 2018.

Dated: September 18, 2018.


UNITED STATES DISTRICT JUDGE